

1 ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

2 PAMELA T. JOHANN (CABN 145558)
3 Chief, Civil Division

4 DOUGLAS JOHNS (CABN 314798)
5 Assistant United States Attorney

6 60 South Market Street, Suite 1200
7 San Jose, California 95113
8 Telephone: (415) 846-8947
9 FAX: (408) 535-5081
10 Douglas.Johns@usdoj.gov

11 Attorneys for UNITED STATES OF AMERICA

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13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 IN RE: REQUEST FOR INTERNATIONAL) MISC. NO.
17 JUDICIAL ASSISTANCE FROM THE)
18 SUWON DISTRICT COURT, REPUBLIC OF)
19 KOREA, IN THE MATTER OF LIFE WORD) DECLARATION OF DOUGLAS JOHNS IN
20 MISSION V. FISHERMAN CATCHING FISH) SUPPORT OF EX PARTE APPLICATION FOR
21) ORDER PURSUANT TO 28 U.S.C. § 1782
22)
23)
24)
25)
26)
27)
28)

1 DECLARATION OF DOUGLAS JOHNS IN SUPPORT OF EX PARTE APPLICATION FOR ORDER PURSUANT TO
2 28 U.S.C. § 1782

1 I, Douglas Johns, declare as follows:

2 1. I am an Assistant United States Attorney and represent the United States of America in
3 the above-captioned matter. I am a member in good standing of the State Bar of California and the Bar
4 of this Court. I make this declaration upon information and belief based upon the attached exhibits and
5 communications with personnel in the United States Department of Justice, to which a Letter of Request
6 has been transmitted for execution. I make this declaration in support of the Government's request,
7 pursuant to 28 U.S.C. § 1782(a), for an Order appointing me Commissioner for the purpose of obtaining
8 information from Google, Inc. The matters stated in this declaration are true of my own knowledge. If
9 necessary, I could, and would, competently testify to them.

10 2. In connection with a judicial proceeding in the Suwon District Court in Anyang-si,
11 Republic of Korea ("Korean Court"), captioned *Life Word Mission v. Fisherman Catching Fish*, Foreign
12 Reference Number 2024-F-3847, the Suwon District Court issued a Letter of Request seeking
13 information from Google. True and correct copies of correspondence received from the Department of
14 Justice and the Letter of Request received are attached as Exhibit 1.

15 3. A true and correct copy of a draft of the subpoena that I will serve on counsel for Google
16 if the Court grants the Application is attached as Exhibit 2.

17 4. On January 24, 2025, I first wrote to Ellen Clarke, Esq., Laura Amos, and Ayesha Minhaj
18 of Google about the Korean Court's request for international judicial assistance. I previously worked
19 with Ellen Clarke, Esq., Laura Amos, and Ayesha Minhaj on similar matters.

20 5. On January 31, 2025, Google responded to my letter. Google stated that it "requires
21 Legal Process to be issued in the U.S. before providing responsive documents."

22 6. Google suggested issuing a subpoena pursuant to an application for order under 28
23 U.S.C. § 1782.

24 7. Google has agreed to accept service by email in this matter.

25 8. On February 13, 2025, I will serve Google with this Application and supporting papers
26 by email.

27 ///

28 DECLARATION OF DOUGLAS JOHNS IN SUPPORT OF EX PARTE APPLICATION FOR ORDER PURSUANT TO
28 U.S.C. § 1782

1 9. No previous Application for the relief sought has been made.

2 I declare under penalty of perjury under the laws of the United States that the above is true and
3 correct. Executed this 13th day of February, 2025, in San Jose, California.

4 */s/ Douglas Johns*

5

DOUGLAS JOHNS
6 Assistant United States Attorney

EXHIBIT 1

**REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE PURSUANT TO
THE HAGUE CONVENTION OF 18 MARCH 1970 ON THE TAKING
OF EVIDENCE ABROAD IN CIVIL OR COMMERCIAL MATTERS**
민사 또는 상사의 해외증거조사협약에 따른 요청서

N.B. Under the first paragraph of Article 4, the Letter of Request shall be in the language of the authority requested to execute it or be accompanied by a translation into that language. However, the provisions of the second and third paragraphs may permit use of English, French or another language.
(주의사항 : 제4조 제1문에 의하여 축탁서는 이를 집행할 수탁 당국의 언어로 작성하거나 그 언어로 된 번역문을 첨부하여야 합니다. 그러나 제2문, 제3문의 규정에 의하여 영어, 불어 그리고 다른 언어도 허용됩니다.)

In order to avoid confusion, please spell out the name of the month in each date.
(혼란을 피하기 위하여, 날짜를 쓸 때는 각 달의 이름을 쓰시기 바랍니다.)

Please fill out an original and one copy of this form.
(원본을 작성 후 사본 1부를 첨부하시기 바랍니다.)

1. Sender
(발송처)

National Court Administration
(Attn: Director of International Affairs)
219 Seocho-daero, Seocho-gu,
SEOUL 06590
REPUBLIC OF KOREA



2. Central Authority of
the Requested State
(수탁 국가의 중앙당국)

Office of International Judicial Assistance
U.S. Department of Justice
1100 L Street, NW, Room 8102
Washington, D.C. 20005
United States of America

3. Person to whom the
executed request is to
be returned
(집행된 요청서의 수신처)

National Court Administration
(Attn: Director of International Affairs)
219 Seocho-daero, Seocho-gu,
SEOUL 06595
the REPUBLIC OF KOREA

4. Specification of the date by which the requesting authority requires receipt of the response
to the Letter of Request
(축탁당국의 요청서에 대한 회신이 언제까지 도착하기를 바라는지 구체적인 날짜를 기재하시기 바랍니다.)

Date
(날짜)

Reason for urgency*
(긴급을 요하는 이유)

* Omit if not applicable.
(필요 없을 경우에는 삭제할 것.)

**IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION,
THE UNDERSIGNED APPLICANT HAS THE HONOUR
TO SUBMIT THE FOLLOWING REQUEST:**

(협약 제3조에 따라 아래에 서명한 신청인은 다음의 촉탁서를 제출합니다.)

5. a Requesting judicial authority (Article 3,a)
(촉탁 사법 당국)
(제3조 1)

Suwon District Court Anyang Branch
(70, Gwanpyeong-ro 212beon-gil, Gwonyang-dong
Dongan-gu, Anyang-si, Gyeonggi-do 14026
South Korea)

b To the competent authority of (Article 3,a)
(집행할 관할 당국)(제3조 1)
(모르는 경우에는 기재하지
말 것.)

c Names of the case and any identifying number
(사건의 이름과 번호)

2024GASO117176 Compensation for damage (Gi)

6. Names and addresses of the parties and their representatives (including representatives in the requested State*) (Article 3,b)
(당사자 및 변호인들의 이름과 주소(수탁 국가내의 변호인들 포함*)(제3조 2)

a Plaintiff
(원고)

LIFE WORD MISSION, Ho-chan Kim, Se-il Oh

Representatives
(변호인)

LIWU LAW GROUP
3rd Fl. Yangjin Bldg.
138 Banpodaero, Seochogu
Seoul, Korea, 06594

b Defendant
(피고)

'fisherman catching fish'(Anonymous)

Representatives
(변호인)

c Other parties
(그 외)

Representatives
(변호인)

* Omit if not applicable.
(필요 없을 경우에는 삭제할 것.)

7. a	Nature of the proceedings(divorce, paternity, breach of contract, product liability, etc.) (Article 3,c) (절차의 성격(이혼, 친자, 계약위반, 생산물 책임, 기타 등등))(제3조 3)	Compensation for damage based on illegal act
b	Summary of complaint (소장(청구)에 대한 요약)	The Defendant spreads false information about the Plaintiffs, leading to business obstruction and defamation, insulting. Accordingly, the Plaintiff in this case filed a civil suit for damage compensation against the Defendant.
c	Summary of defence and counterclaim* (답변과 반소의 요약)	
d	Other necessary information or documents* (그 외 필요한 정보 및 문서*)	
8. a	Evidence to be obtained or other judicial act to be performed(Article 3,d) (취득할 증거 또는 이행할 그 밖의 사법적 처분)(제3조 4)	Personal information of the Defendant who is an operator of YouTube channel, 'https://www.youtube.com/@Bok72' : email address, name, phone number, date of birth, address [Please refer to the attachment for details.]
b	Purpose of the evidence or judicial act sought (증거 또는 사법적 처분을 요청하는 목적)	In order to identify the defendant in this case.
9.	Identity and address of any person to be examined (Article 3,e)* (신문 받을 자의 신원과 주소)* (제3조 5)*	Google LLC(Google LLC's registered service agent, Corporation Service Company). Address: Corporation Service Company 2710 Gateway Oaks Drive, Suite 150N Sacramento, CA 95833, United States of America Email: internationalcivil@google.com google-legal-support@google.com
10.	Questions to be put to the persons to be examined or statement of the subject matter about which they are to be examined (Article 3,f)* (신문받을 자에게 할 질문 또는 신문이 이루어질 소송물(주된 내용)에 관한 설명)(제3조 6)*	

* Omit if not applicable.
(필요 없을 경우에는 삭제할 것.)

11. Documents or other property to be inspected
(Article 3,g)*
(증거조사가 이루어질 서류나 물건
(부동산, 동산 등))(제3조 7)*

12. Any requirement that the evidence be given on oath or affirmation and any special form to be used
(Article 3,h)*
(증거가 선서 또는 서약에 의하여 제출되어야 하는 요건 및 사용될 특별한 형식)(제3조 8)*

13. Special methods or procedure to be followed (e.g. oral or in writing, verbatim, transcript or summary, cross-examination, etc.)
(Articles 3, i)and 9)*
(따라야 하는 특별한 방식
또는 절차)
(예: 말로 또는 글로, 말한 그대로
글로, 글로 옮긴 기록 또는 요약.
반대신문, 기타 등등)(제3조 9,
제9조)*



14. Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified
(Article 7)*
(촉탁서의 집행 시간과 장소를
관계 당사자 또는 대리인에게
알려 달라는 요청
그리고 알려줘야 할 이의 신원과
주소)(제7조)*

15. Request for attendance or participation of judicial personnel of the request authority at the execution of the Letter of Request
(Article 8)*
(촉탁서의 집행시에 촉탁 당국
법관의 출석 또는 참여 요청)
(제8조)*

* Omit if not applicable.
(필요없을 경우에는 삭제할 것.)

16. Specification of privilege or duty to refuse to give evidence under the law of the State of origin
(Article 11,b)*
(속국의 법에 의하여 증거 제출을 거부할 특권이나 의무)
(제11조 2)*

17. The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention will be borne by*
(14조항과 26조항에 의한 요금과 비용의 상환 주체)

DATE OF REQUEST

May 13, 2024



SIGNATURE AND SEAL OF THE REQUESTING AUTHORITY

Choi Bok Kyu



* Omit if not applicable.
(필요없을 경우에는 삭제할 것.)

ITEMS TO BE PRODUCED

Please produce documents containing the following Personally-Identifying Information about the channel operators of the YouTube channel listed below:



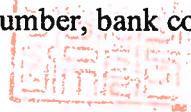
The YouTube channel identified below spread false information about the Plaintiffs, leading to business obstruction and defamation, especially bullying and cyberbullying aimed only at maliciously insulting the Plaintiffs. Accordingly, the plaintiffs in this case filed a civil suit for damages against the following channel operator as defendant, and since torts are being committed through your company's YouTube service, please produce documents for the following requirements in order to identify the defendant.

- The following information from the person who runs a channel called '생선잡는어부' (URL: <https://www.youtube.com/@Bok72>) in the YouTube service operated by your company.

[AdSense Account Information]

- Customer profile details: email, AdSense Publisher ID, Google Account ID
- Billing Profile
 - > billing address: address, contact name, email, phone, fax, country code
 - > customer legal address
 - > pin verification address - address, contact name, email, phone, fax, country code

[Google Pay Information]

- registered email
- Billing Customer Number
- Google Account ID
- All Billing Addresses: address, telephone number
- Contacts: name, phone, email
- Bank account information: name of bank, bank account number, bank code,  billing name, billing address

[Google Account Information]

- Google Account ID, name, email, alternate emails, birthday, Google services being used, date account was deleted, account deletion IP address, last date account was updated, contact email, recovery email, recovery SMS, phone number, 2-Step Verification Phone Numbers, IP activity (about 3 months' timestamps, associated IP addresses, details of device/browser)

Registered No. 2024-3396

우편제출

CERTIFICATE



GNS TRANSLATION & ADMINISTRATION OFFICE

#1405 Daeil Bldg. 12, Insadong-gil, Jongno-gu, Seoul, Korea



**REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE PURSUANT TO
THE HAGUE CONVENTION OF 18 MARCH 1970 ON THE TAKING
OF EVIDENCE ABROAD IN CIVIL OR COMMERCIAL MATTERS**

민사 또는 상사의 해외증거조사협약에 따른 요청서

N.B. Under the first paragraph of Article 4, the Letter of Request shall be in the language of the authority requested to execute it or be accompanied by a translation into that language.

However, the provisions of the second and third paragraphs may permit use of English, French or another language.

(주의사항 : 제4조 제1문에 의하여 촉탁서는 이를 집행할 수탁 당국의 언어로 작성하거나 그 언어로 된 번역문을 첨부하여야 합니다. 그러나 제2문, 제3문의 규정에 의하여 영어, 불어 그리고 다른 언어도 허용됩니다.)

In order to avoid confusion, please spell out the name of the month in each date.
(혼란을 피하기 위하여, 날짜를 쓸 때는 각 달의 이름을 쓰시기 바랍니다.)

Please fill out an original and one copy of this form.
(원본을 작성 후 사본 1부를 첨부하시기 바랍니다.)

1. Sender
(발송처)

법원행정처
(국제심의관 앞)
대한민국 서울 서초구 서초대로 219
06590

2. Central Authority of
the Requested State
(수탁 국가의 중앙당국)

미국 법무부
국제 사법 지원 사무소
1100 L Street, NW, Room 8102
Washington, D.C. 20005
United States of America

3. Person to whom the
executed request is to
be returned
(집행된 요청서의 수신처)

법원행정처
(국제심의관 앞)
대한민국 서울 서초구 서초대로 219
06590

4. Specification of the date by which the requesting authority requires receipt of the response
to the Letter of Request
(촉탁당국의 요청서에 대한 회신이 언제까지 도착하기를 바라는지 구체적인 날짜를 기재하시기 바랍니다.)

Date
(날짜)

Reason for urgency*
(긴급을 요하는 이유)

* Omit if not applicable.
(필요 없을 경우에는 삭제할 것.)

**IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION,
THE UNDERSIGNED APPLICANT HAS THE HONOUR
TO SUBMIT THE FOLLOWING REQUEST:**

(협약 제3조에 따라 아래에 서명한 신청인은 다음의 촉탁서를 제출합니다.)

5. a Requesting judicial authority (Article 3,a)
(촉탁 사법 당국)
(제3조 1)

수원지방법원 안양지원
(경기도 안양시 동안구 관평로 212번길 70 (관양동))

b To the competent authority of (Article 3,a)
(집행할 관할 당국)(제3조 1)
(모르는 경우에는 기재하지
말 것.)

c Names of the case and any identifying number
(사건의 이름과 번호)

2024가소117176 손해배상(기)

6. Names and addresses of the parties and their representatives (including representatives in the requested State*) (Article 3,b)
(당사자 및 변호인들의 이름과 주소(수탁 국가내의 변호인을 포함*))(제3조 2)

a Plaintiff
(원고)

생명의말씀선교회, 김호찬, 오세일



Representatives
(변호인)

법무법인 리우
대한민국 서울 서초구 반포대로 138, 양진빌딩 3층,
(우)06594

b Defendant
(피고)

생선잡는어부(성명불상자)

Representatives
(변호인)

c Other parties
(그 외)

Representatives
(변호인)

* Omit if not applicable.
(필요 없을 경우에는 삭제할 것.)

7. a	Nature of the proceedings(divorce, paternity, breach of contract, product liability, etc.) (Article 3,c) (절차의 성격(이혼, 친자, 계약위반, 생산물 책임, 기타 등등))(제3조 3)	불법 행위로 인한 손해배상 청구
b	Summary of complaint (소장(청구)에 대한 요약)	피고는 원고들에 대한 모욕과 허위 사실 유포로 인하여 원고들의 업무방해 및 명예훼손, 모욕을 하였습니다. 이에 원고는 피고를 상대로 피해에 대한 본 민사소송을 제기하였습니다.
c	Summary of defence and counterclaim* (답변과 반소의 요약)	
d	Other necessary information or documents* (그 외 필요한 정보 및 문서*)	
8. a	Evidence to be obtained or other judicial act to be performed(Article 3,d) (취득할 증거 또는 이행할 그 밖의 사법적 처분)(제3조 4)	유튜브 채널 '생선잡는어부' (https://www.youtube.com/@Bok72)를 운영하는 자의 신원 확인 정보: 이메일주소, 이름, 전화번호, 생일, 주소): [세부 내용은 첨부자료를 참고해주시기 바랍니다.]
b	Purpose of the evidence or judicial act sought (증거 또는 사법적 처분을 요청하는 목적)	본 소송의 피고를 특정하고자 합니다.
9.	Identity and address of any person to be examined (Article 3,e)* (신문 받을 자의 신원과 주소)* (제3조 5)*	구글 유한회사 (구글 유한회사의 등록 서비스 대리인, 법인 서비스 회사). 주소: Corporation Service Company 2710 Gateway Oaks Drive, Suite 150N Sacramento, CA 95833, United States of America 이메일: internationalcivil@google.com google-legal-support@google.com
10.	Questions to be put to the persons to be examined or statement of the subject matter about which they are to be examined (Article 3,f)* (신문받을 자에게 할 질문 또는 신문이 이루어질 소송물(주된 내용)에 관한 설명)(제3조 6)*	[세부 내용은 첨부자료를 참고해주시기 바랍니다.]

* Omit if not applicable.
(필요 없을 경우에는 삭제할 것.)

11. Documents or other property to be inspected
(Article 3,g)*
(증거조사가 이루어질 서류나 물건
(부동산, 동산 등))(제3조 7)*

12. Any requirement that the evidence be given on oath or affirmation and any special form to be used
(Article 3,h)*
(증거가 선서 또는 서약에 의하여 제출되어야 하는 요건 및 사용될 특별한 형식)(제3조 8)*

13. Special methods or procedure to be followed (e.g. oral or in writing, verbatim, transcript or summary, cross-examination, etc.)
(Articles 3, i)and 9)*
(따라야 하는 특별한 방식
또는 절차)
(예: 말로 또는 글로, 말한 그대로
글로, 글로 옮긴 기록 또는 요약,
반대신문, 기타 등등)(제3조 9,
제9조)*

14. Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified
(Article 7)*
(촉탁서의 집행 시간과 장소를
관계 당사자 또는 대리인에게
알려 달라는 요청,
그리고 알려줘야 할 이의 신원과
주소)(제7조)*

15. Request for attendance or participation of judicial personnel of the request authority at the execution of the Letter of Request
(Article 8)*
(촉탁서의 집행시에 촉탁 당국
법관의 출석 또는 참여 요청)
(제8조)*

* Omit if not applicable.
(필요없을 경우에는 삭제할 것.)

16. Specification of privilege or duty to refuse to give evidence under the law of the State of origin
(Article 11,b)*
(축탁국의 법에 의하여 증거 제출을 거부할 특권이나 의무)
(제11조 2)*

17. The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention will be borne by*
(14조항과 26조항에 의한 요금과 비용의 상환 주체)

DATE OF REQUEST

2024년 5월 13일

SIGNATURE AND SEAL OF THE REQUESTING AUTHORITY

Choi Bok Kyu

* Omit if not applicable.
(필요없을 경우에는 삭제할 것.)

등부 2024년 제 3396호

Registered No. 2024-3396

외 국 어 번 역 행 정 사 확 인 서

CERTIFICATE OF LICENSED
TRANSLATION

나는 첨부된 문서가 본 사무소에 의하여 번역
이 되었으며 그 번역이 진실되고 원본과 일치
한 것임을 증명한다.

위 번역문은 원본과 일치하게 번역하였기에 대
한민국 행정사법 제 20조에 의거하여 번역확
인증명서에 서명 날인하였다.

I hereby certify that GNS CO.,LTD., translated
the attached document.

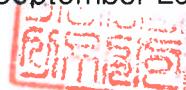
The translation is true, correct and accurate
to the original.

Since the above translation was translated to
match the original, the Certificate of
Translation was signed and sealed in
accordance with Article 20 of the Licensed
Administrative Agent Act in the Republic of the
Korea.

2024년 09월 10일
위 사무소에서 인증한다.

대한행정사협회
등록번호 : 제 267호

This is hereby confirmed on this 10th day of
September 2024 at this office.



Korean Association of Public Administration Lawyer
Registration Number : 267

羅 完 植



외국어 번역행정사
자격증 번호: 15300000110

WGS 11b Ro



Licensed Administrative Agent
License No. 15300000110

지앤에스 번역행정사 사무소
서울 종로구 인사동길 12, 1405호(인사동, 대일빌딩)

GNS TRANSLATION & ADMINISTRATION OFFICE
#1405 Daeil Bldg, 12, Insadong-gil, Jongno-gu, Seoul, Korea

Registered No. 2024-3414

우편제출

CERTIFICATE



GNS TRANSLATION & ADMINISTRATION OFFICE



#1405 Daeil Bldg, 12, Insadong-gil, Jongno-gu, Seoul, Korea

생산 요청 문서

아래 나열된 YouTube 채널의 채널 운영자에 대한 다음과 같은 개인 식별 정보가 포함된 문서를 작성해 주시기 바랍니다.

아래 확인된 YouTube 채널은 이 사건 원고들에 대한 허위사실을 유포하여 업무방해, 명예훼손에 이르렀고, 특히 원고들을 악의적으로 모욕하는 데에만 목적이 있는 괴롭힘, 사이버폭력을 위한 계정입니다. 이에 이 사건 원고들은 아래 채널 운영자를 피고로 하여 민사상 손해배상 청구 소송을 제기하였고, 귀사의 YouTube 서비스를 통해 불법행위가 이루어지고 있으므로, 피고를 특정하기 위해서 다음 요구사항에 대한 문서를 생산해 주시기 바랍니다.

■ 귀사에서 운영하는 YouTube 서비스에서 ‘생선잡는어부’라는 채널(URL: <https://www.youtube.com/@Bok72>)을 운영하는 사람의 아래와 같은 정보.

[애드센스 계정 정보]

- 고객 프로필 세부정보: 이메일, 애드센스 계시자 ID, Google 계정 ID
- 결제 프로필
 - > 청구 주소: 주소, 연락처 이름, 이메일, 전화, 팩스, 국가 코드
 - > 고객 법적 주소
 - > PIN 확인 주소: 주소, 연락처 이름, 이메일, 전화, 팩스, 국가 코드

[구글페이 정보]

- 등록된 이메일

- 청구 고객 번호
- 구글 계정 아이디
- 모든 청구지 주소: 주소, 전화번호
- 연락처: 이름, 전화번호, 이메일
- 은행계좌정보: 은행이름, 계좌번호, 은행코드, 청구자명, 청구지주소

[구글 계정 정보]

- 구글 계정 아이디, 이름, 이메일, 보조 이메일, 생일, 구글 서비스 이용, 계정 삭제 날짜, 계정 삭제 IP 주소, 계정이 마지막으로 업데이트된 날짜, 연락처 이메일, 복구 이메일, 복구 SMS, 전화번호, 2-Step 확인 전화번호, IP 활동(약 3개월 분량의 타임스탬프, 관련 IP 주소, 기기/브라우저 세부정보)

등부 2024년 제 3414호

Registered No. 2024-3414

외 국 어 번 역 행 정 사 확 인 서

CERTIFICATE OF LICENSED
TRANSLATION

나는 첨부된 문서가 본 사무소에 의하여 번역
이 되었으며 그 번역이 진실되고 원본과 일치
한 것임을 증명한다.

위 번역문은 원본과 일치하게 번역하였기에 대
한민국 행정사법 제 20조에 의거하여 번역확
인증명서에 서명 날인 하였다.

I hereby certify that GNS CO.,LTD., translated
the attached document.

The translation is true, correct and accurate
to the original.

Since the above translation was translated to
match the original, the Certificate of
Translation was signed and sealed in
accordance with Article 20 of the Licensed
Administrative Agent Act in the Republic of the
Korea.

2024년 09월 11일
위 사무소에서 인증한다.

This is hereby confirmed on this 11th day of
September 2024 at this office.

대한행정사협회
등록번호 : 제 267호

Korean Association of Public Administration Lawyer
Registration Number : 267

羅 完 植

won ik Ra

외국어 번역행정사
자격증 번호: 15300000110

Licensed Administrative Agent
License No. 15300000110

지앤에스 번역행정사 사무소
서울 종로구 인사동길 12, 1405호(인사동, 대일빌딩)

GNS TRANSLATION & ADMINISTRATION OFFICE
#1405 Daeil Bldg, 12, Insadong-gil, Jongno-gu, Seoul, Korea



법무법인 리우
06595 서울특별시 서초구 반포대로 138 양진빌딩 3, 5층
3F. Tel +82 2 524 9600 Fax +82 2 524 9696
5F. Tel +82 2 524 9620 Fax +82 2 524 9688

www.liwulaw.com liwulaw@liwulaw.com

January 3, 2025

(Via Email to OIJA@usdoj.gov)

To: Krysta M. Stanford
U.S. Department of Justice
Civil Division
Office of International Judicial Assistance

Re: Request for International Judicial Assistance from the Suwon District Court Anyang Branch in Gyeonggi-do, South Korea in Life Word Mission, et al. v. 'fisherman catching fish', Re. No. 2024-F-3847

DJ Reference Number: 189-34-25-10

Dear Ms. Stanford,

Thank you for your letter dated December 11, 2024 to the National Court Administration regarding the above-referenced matter.

For your information, the target URL is still alive with change of handle name. While we are pursuing this process, the tortfeasor changed the handle name of "@Bok72" to "@Fishermanwithgod" As you may know, it is very easy to change the URL or handle name



of a Youtube channel at any time. Therefore, please do not close this case nor return the files to us. Google, LLC has kept the identification information of “@Bok72” as well. Please visit www.youtube.com/@Fishermanwithgod and let us know if you have any questions.

Sincerely yours

A handwritten signature in black ink, appearing to read "Kyong Sok Chong".

Kyong Sok Chong, A partner at LIWU

EXHIBIT 2

UNITED STATES DISTRICT COURT
 for the
 Northern District of California

In Re: Request For International Judicial Assistance

<ol style="list-style-type: none"> <i>Plaintiff</i> v. 	<ol style="list-style-type: none">))))
<i>Defendant</i>	

Civil Action No.

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
 OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Google, Inc., 1600 Amphitheater Parkway, Mountain View, California 94043, google-legal-support@google.com

(Name of person to whom this subpoena is directed)

Production: **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Please see Attachment A.

Place: Please see Attachment A.	Date and Time:
---------------------------------	----------------

Inspection of Premises: **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
--------	----------------

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT

OR

/s/ Douglas Johns, AUSA

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* _____
 Court-Appointed Commissioner _____, who issues or requests this subpoena, are:

Douglas Johns, USAO, 60 S. Market Street, Ste. 1200, San Jose CA, 95113, Douglas.Johns@usdoj.gov, 415-846-8947

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____

on *(date)* _____ .

I served the subpoena by delivering a copy to the named person as follows: _____

By email pursuant to an agreement with Google, Inc. at the following email address:

google-legal-support@google.com _____ on *(date)* _____ ; or

I returned the subpoena unexecuted because: _____ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of

\$ _____ .

My fees are \$ _____ 0.00 for travel and \$ _____ 0.00 for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: 02/05/2025

/s/ Douglas Johns

Server's signature

Douglas Johns, Assistant United States Attorney

Printed name and title

60 South Market Street, Suite 1200, San Jose, California 95113

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Attachment A

YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material set forth below and pursuant to the terms and provisions set forth below and as further set forth in the Order Granting the United States of America's Ex Parte Application Pursuant to 28 U.S.C. § 1782 in the United States District Court for the Northern District of California:

1. Upon receipt of the subpoena, Google, Inc. shall promptly make a diligent search for the information contained in the Request Letter including, but not limited to, a diligent search for (1) the personal information of the alleged defendant who allegedly operates the following account: <https://www.youtube.com/@Bok72>; (2) the email address, phone number, date of birth, and address associated with that account; (3) the customer profile of that account including the associated email address, "AdSense Publisher ID," and "Google Account ID,"; (4) billing profile associated with that account including the billing address, contact name, email address, phone number, fax number, county code, customer address, and "pin verification address"; (5) "Google Pay Information" associated with that account including the registered email, customer name, "Google Account ID," billing address, telephone number, name, phone number, email address, and bank account information such as the name of the bank, bank account number, bank code, billing name, and billing address; and (6) "Google Account Information" associated with that account including the "Google Account ID," name, email address, date of birth, services used by Google, the date the account was deleted, account deletion IP address, the late date the account was updated, contact email, recovery email, recovery "SMS," phone number, IP activity; and "2-step verification phone numbers."
2. Google shall serve a copy of the subpoena and a copy of the Order referenced above on each individual associated with the YouTube channel <https://www.youtube.com/@Bok72> within 30 days of the date of service of the subpoena on Google. Google may serve any such individual(s) using any reasonable means, including written notice sent to their last known address, transmitted either by first-class mail or via overnight service. Google and each individual associated with the previously listed YouTube channel shall have 30 calendar days from the date of service upon them to file any motions in this court to contest the subpoena.
3. Within 30 calendar days from receipt of the subpoena, Google shall produce the information described in paragraph 1 above, to the extent it is available, along with a notarized verification signed under penalty of perjury to the Court-Appointed Commissioner, Douglas Johns, Assistant United States Attorney, notwithstanding any other paragraph or provision in this subpoena.
4. Google can produce the information described in paragraph 1 above directly to the Suwon District Court in Anyang-si, Republic of Korea, but the information in paragraph 1 must be sent to the address set forth directly below.

**National Court Administration
Atten: Director of International Affairs
219 Seocho-Daero, Seocho-Gu
Seoul 06590
Republic of Korea.**

If Google produces the information described in paragraph 1 directly to the Suwon District Court in Anyang-si, Republic of Korea, it must provide the Court-Appointed Commissioner, Douglas Johns, Assistant United States Attorney, with a certification attesting that it responded directly to the Korean Court within ten (10) days of the information described in paragraph 1 being produced.

5. Absent an objection or motion for protective order filed prior to the expiration of Google's 30-day notice period regarding the Application or subpoena served on Google, in response to the subpoena, Google shall produce the information described in paragraph 1 above, to the extent it is available, notwithstanding any other provision or paragraph in this subpoena.
6. Google will not disclose any information that would be inconsistent with its obligations under the federal law including, but not limited to, the Stored Communications Act.
7. If Google requires an additional or modified uniform resource locator, "URL," to process the subpoena, or any additional information to process the subpoena, upon receipt of the requested updated or new URL or additional information from AUSA Johns, Google will agree to provide the information responsive to the Request Letter within 30 calendar days, along with a notarized verification signed under penalty of perjury to AUSA Johns.